

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

BENJAMIN BURGESS, RHONDA	)	
BURGESS, HEIDI HOWARD,	)	
JOYCE MARTIN, BETH	)	CIVIL ACTION NO.
KARAMPELAS, TERRI DACY,	)	
and MICHAEL DACY, individually	)	1:13-cv-02217
and on behalf of all others similarly	)	
situated,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	
	)	
RELIGIOUS TECHNOLOGY	)	
CENTER, INC., ASSOCIATION	)	
FOR BETTER LIVING AND	)	
EDUCATION INTERNATIONAL,	)	
NARCONON INTERNATIONAL, and	)	
NARCONON OF GEORGIA, INC.,	)	
	)	
Defendants.	)	
	)	

**PLAINTIFFS' RESPONSE TO NARCONON OF GEORGIA, INC.'S**  
**CONDITIONAL MOTION TO FILE CONTRACTS UNDER SEAL**

Plaintiffs have no objection to Defendant Narconon of Georgia, Inc.'s  
conditional motion to file contracts under seal.

Respectfully submitted,

**HARRIS PENN LOWRY, LLP**

/s/ Jeffrey R. Harris

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**CERTIFICATION OF COMPLIANCE**

Pursuant to the Local Rules of the Northern District of Georgia, the above-signed counsel certifies that the foregoing document complies with all formatting requirements of the Local Rules and further certifies that this document is printed in Times New Roman font, 14-point, pursuant to Local Rule 5.1(C).

## CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing

### **PLAINTIFFS' RESPONSE TO NARCONON OF GEORGIA, INC.'S**

### **CONDITIONAL MOTION TO FILE CONTRACTS UNDER SEAL**

with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorney of record:

<p>Cari K. Dawson, Esq. Daniel F. Diffley, Esq. David B. Carpenter, Esq. Alston &amp; Bird LLP 1201 W. Peachtree Street Atlanta, GA 30309-3424</p> <p><i>Attorneys for Narconon International and Association for Better Living and Education International</i></p>	<p>Matthew S. Coles, Esq. Thomas M. Barton, Esq. Coles Barton LLP 150 South Perry Street, Suite 100 Lawrenceville, GA 30046</p> <p><i>Attorneys for Narconon International and Association for Better Living and Education International</i></p>
<p>Edward H. Lindsey, Jr., Esq. James T. Hankins, Esq. Goodman McGuffey Lindsey &amp; Johnson, LLP 3340 Peachtree Road NE, Suite 2100 Atlanta, GA 30326-1084</p> <p><i>Attorneys for Narconon of Georgia, Inc.</i></p>	<p>John K. Larkins, Jr., Esq. William Taylor McNeil, Esq. J.D. Dalbey, Esq. Chilivis, Cochran, Larkins &amp; Bever LLP 3127 Maple Drive NE Atlanta, GA 30305</p> <p><i>Attorneys for Narconon of Georgia, Inc.</i></p>
<p>John H. Fleming, Esq. Valerie S. Sanders, Esq. Stacey M. Mohr, Esq. Sutherland Asbill &amp; Brennan LLP 999 Peachtree Street NE, Suite 2300 Atlanta, GA 30309-3996 <i>Attorneys for Religious Technology Center, Inc.</i></p>	

This 23<sup>rd</sup> day of July, 2013.

**HARRIS PENN LOWRY LLP**

/s/ Jeffrey R. Harris

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